

**MELWANI & CHAN LLP**

1180 Avenue of the Americas, 8<sup>th</sup> Floor  
New York, NY 10036  
(212) 382-4620

April 13, 2021

**VIA ECF**

The Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, New York 10007

Re: Wang v. MDC Partners Inc., et al., 1:21-cv-1126-DLC  
McKinnon v. MDC Partners Inc., et al., 1:21-cv-2381-DLC

Dear Judge Cote:

We represent plaintiff Wang in the first above referenced action and Joshua Lifshitz represents Plaintiff McKinnon in the second above referenced action. The plaintiffs in the above actions submit this letter to respectfully request an adjournment of the initial pretrial conference currently scheduled in these actions for April 16, 2021 at 3:00pm. We have spoken with counsel for defendants who informed us that defendants do not oppose this request.

Plaintiff Wang commenced her individual action by filing a complaint on February 8, 2021, challenging certain disclosures in the Registration Statement ("Registration Statement") on Form S-4 filed with the Securities Exchange Commission in connection with the proposed acquisition of MDC Partners Inc. ("MDC") by Stagwell Media LP ("Stagwell"). Plaintiff McKinnon commenced his individual action by filing a complaint on March 18, 2021, similarly challenging certain disclosures in the Registration Statement. Since then, counsel for the parties have been in discussions concerning potential additional disclosures to be made by MDC that would moot the complaints. Accordingly, plaintiffs jointly request that the Court adjourn the conference until May 14, 2021 while the parties continue their discussions.

Sincerely yours,



Gloria Kui Melwani

cc: Joshua M. Lifshitz, Esq.  
Mark E. McDonald, Esq.